

# Exhibit A

In Re: Bard IVC Filters ) MD-15-02641-PHX-DGC  
Products Liability Litigation )  
) Phoenix, Arizona  
) May 18, 2018  
Doris Jones, an individual, ) 8:30 a.m.  
)  
Plaintiff, )  
) CV 16-00782-PHX-DGC  
vs. )  
)  
C.R. Bard, Inc., a New )  
Jersey corporation; and Bard )  
Peripheral Vascular, Inc., an )  
Arizona corporation, )  
)  
Defendants. )  
\_\_\_\_\_ )

(Jury Trial - Day 4 - A.M. Session)  
(Pages 720 through 861, inclusive.)

Proceedings Reported by Stenographic Court Reporter  
Transcript Prepared by Computer-Aided Transcription

1 A. I do not use Bard filters after I had an opportunity to see  
2 the internal documents that Bard had showing that there have  
3 been problems with their filters over a long period of time.  
4 And those problems were not relayed to physicians in their  
5 marketing material or through their representatives so that we  
6 could talk to our patients and give them an honest estimate of  
7 what their risk factors were when they had these filters  
8 placed.

9 I personally felt betrayed by that. I was a loyal  
10 user of Bard at the time. Our interventional radiologist in my  
11 hospital stopped using the Bard device, but I stuck with them.  
12 And when I had an opportunity to kind of see the internal  
13 documents and see that there were problems known for a long  
14 time, and that when these problems were dealt with, they were  
15 never studied in humans. They were just sold. They were put  
16 back into humans to see how they did without any real testing  
17 with them. And I have a moral and ethical issue with that.

18 Q. And in addition to implanting IVC filters, have you removed  
19 them?

20 A. I have removed them, yes.

21 Q. In private practice, have you been provided with brochures  
22 on the Bard IVC filters?

23 A. Yes, we have.

24 Q. Have you seen the brochure for the Eclipse permanent  
25 filter?

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

I, LAURIE A. ADAMS, do hereby certify that I am duly appointed and qualified to act as Official Court Reporter for the United States District Court for the District of Arizona.

I FURTHER CERTIFY that the foregoing pages constitute a full, true, and accurate transcript of all of that portion of the proceedings contained herein, had in the above-entitled cause on the date specified therein, and that said transcript was prepared under my direction and control.

DATED at Phoenix, Arizona, this 18th day of May, 2018.

s/Laurie A. Adams

---

Laurie A. Adams, RMR, CRR